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Attorneys for Defendant
 GOODLEAP LLC

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

CHUCK ROWLETT,

Plaintiff,

v.

GOODLEAP, LLC; DOE DEFENDANTS I
 THROUGH X; AND ROE CORPORATIONS
 I THROUGH X,

Defendants.

Case No. 2:24-cv-01524-MDC

**STIPULATION AND REQUEST FOR
 ORDER EXTENDING TIME FOR
 DEFENDANT GOODLEAP, LLC TO
 RESPOND TO PLAINTIFF CHUCK
 ROWLETT'S COMPLAINT**

[SECOND REQUEST]

Complaint Filed: July 26, 2024

Defendant GOODLEAP, LLC, ("GoodLeap") and Plaintiff CHUCK ROWLETT ("Plaintiff"), by and through their respective attorneys of record, stipulate and agree to extend the deadline for GoodLeap to file a responsive pleading to Plaintiff's Complaint [ECF No. 1-3 (state complaint)] to September 10, 2024. This is the Parties second request to extend the deadline to respond to the Complaint.

1. On July 26, 2024, Plaintiff CHUCK ROWLETT ("Plaintiff") filed this action in the Eighth Judicial District in Clark County, State of Nevada, entitled *Rowlett v. GoodLeap, LLC*, which was assigned case number A-24-898447-C.

2. The Summons and the Complaint were served upon GoodLeap, LLC's registered agent on July 31, 2024.

3. On August 20, 2024, GoodLeap removed the action from the Eighth Judicial

District Court to this Court, contending this Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331, as GoodLeap contends the Complaint alleges a federal claim under the Truth-in-Lending Act (15 U.S.C. § 1631, *et seq.*). As a result, pursuant to Federal Rule of Civil Procedure 81(c)(2), GoodLeap's current deadline to file a responsive pleading is August 27, 2024.

4. On August 26, 2024, GoodLeap requested Plaintiff to extend the deadline to respond to the Complaint to September 10, 2024. Part of the reason GoodLeap requested the extension was to discuss the allegations contained in Plaintiff's Complaint and to determine if early resolution is possible. That same day, Plaintiff agreed to the requested extension.

5. Accordingly, on August 28, 2024, the Parties submitted a stipulation to this Court to extend the deadline for GoodLeap to file a responsive pleading to Plaintiff's Complaint [ECF No. 1-3 (state complaint)] to September 10, 2024. (ECF No. 8) On August 30, 2024, the Court granted the stipulation. (ECF No. 8.)

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6. Since then, the Parties have been engaged in settlement negotiations and are hopeful to reach a settlement within in the next two weeks. Accordingly, the Parties have again stipulated to extend the deadline for GoodLeap to respond to Plaintiff's Complaint for another two weeks to September 24, 2024. Should the Parties reach a tentative settlement before September 24, 2024, the Parties will promptly submit a notice of settlement to the Court. This stipulation is being submitted in good faith and not for purposes of delay.

IT IS SO STIPULATED.

Dated: September 10, 2024

ROPERS MAJESKI PC

By: /s/ Timothy J. Lepore

TIMOTHY J. LEPORE
Attorneys for Defendant
GOODLEAP LLC

Dated: September 10, 2024

LAW OFFICES OF MILES N. CLARK, LLC

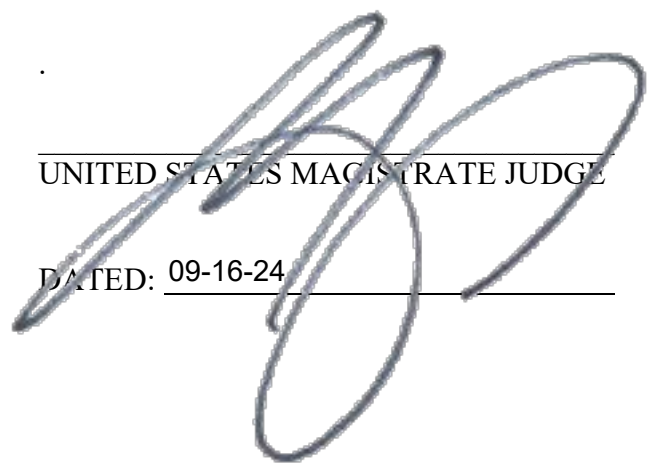
By: /s/ Miles N. Clark

MILES N. CLARK
Attorneys for Plaintiff
CHUCK ROWLETT

IT IS SO ORDERED. The stipulation is denied with leave to refile. The parties propose two different dates for the same extension. The parties may refile stipulation clarifying or correcting the extension date.

UNITED STATES MAGISTRATE JUDGE

DATED: 09-16-24



CERTIFICATE OF SERVICE

I certify that on September 10, 2024, I served the foregoing **STIPULATION AND REQUEST FOR ORDER EXTENDING TIME FOR DEFENDANT GOODLEAP, LLC TO RESPOND TO PLAINTIFF CHUCK ROWLETT'S COMPLAINT** to be filed via the Court's CM/ECF system, which will accomplish service on all parties of record through their counsel.

/s/ Stephanie Hart
Stephanie Hart